

ELLIOTT & ELLIOTT, P.A.  
ATTORNEY AT LAW  
1508 Lady Street  
COLUMBIA, SOUTH CAROLINA 29201  
[selliott@elliottlaw.us](mailto:selliott@elliottlaw.us)

SCOTT ELLIOTT

TELEPHONE (803) 771-0555  
FACSIMILE (803) 771-8010

November 22, 2021

**VIA E-FILING**

Jocelyn D. Boyd  
Chief Clerk and Administrator  
South Carolina Public Service Commission  
101 Executive Center Drive  
Columbia, SC 29210

RE: Application of Lynches River Communications, Inc. for Designation as an  
Eligible Telecommunications Carrier in the State of South Carolina  
Docket No. 2021-316-C

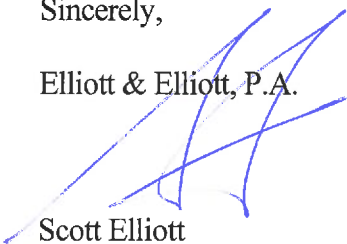
Dear Ms. Boyd:

Enclosed please find for filing the Prefiled Direct Testimony of Dustin Catoe on behalf of Lynches River Communications, Inc. in connection with the above referenced matter. By copy of this letter, I am serving all parties of record.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Sincerely,

Elliott & Elliott, P.A.



Scott Elliott

SE/lbk

Enclosures

cc: All parties of record. (w/encl. via Electronic Mail)

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

**DOCKET NO. 2021-316-C**

---

IN RE: )

Application of Lynches River Communications, Inc. )  
for Designation as an Eligible Telecommunications )  
Carrier in the State of South Carolina )

---

**DIRECT TESTIMONY OF DUSTIN CATOE**

**Q: PLEASE STATE YOUR NAME, YOUR POSITION WITH LYNCHES RIVER COMMUNICATIONS, INC. AND YOUR BUSINESS ADDRESS.**

**A:** My name is Dustin Catoe. I am Chief Financial Officer of Lynches River Communications, Inc. (hereinafter referred to as "Lynches River" or the "Company"). My business address is 707 S Arant Street, Pageland, SC, 29728.

**Q: PLEASE PROVIDE A BRIEF DESCRIPTION OF THE COMPANY.**

**A:** Lynches River is a South Carolina corporation organized in the State of South Carolina on September 30, 2019 and is currently in good standing. Its principal office is located at 707 South Arant Street, Pageland, South Carolina 29728. Lynches River is a provider of high-speed fiber internet and phone service through a service the Company named *RiverNet Connect*. Lynches River is a subsidiary of Lynches River Electric Cooperative ("LREC"), a member-owned cooperative also headquartered in Pageland, South Carolina. Founded in 1939, LREC provides service to more than 21,000 residential, commercial, and industrial consumers in Chesterfield, Kershaw, and Lancaster counties.

1 **Q: PLEASE BRIEFLY DESCRIBE YOUR PROFESSIONAL BACKGROUND AND**  
2 **YOUR RESPONSIBILITIES AT LYNCHES RIVER.**

3 **A:** I received a Bachelor of Science in Business Administration/Accounting from the  
4 University of South Carolina. I have worked in private and public accounting for over 17  
5 years and have served as the Chief Financial Officer for Lynch River Electric  
6 Cooperative for more than three years.

7 **Q: ON WHOSE BEHALF ARE YOU TESTIFYING HERE TODAY AND WHAT IS**  
8 **THE PURPOSE OF YOUR TESTIMONY?**

9 **A:** I am testifying on behalf of Lynch River Communications, Inc. The purpose of my  
10 testimony is to demonstrate that Lynch River meets the state and federal requirements  
11 for designation as an eligible telecommunications carrier (“ETC”) in the State of South  
12 Carolina and to support Lynch River Application for Designation as an ETC in the State  
13 of South Carolina (the “Application”), which was filed on September 28, 2021.

14 **Q: PLEASE PROVIDE MORE DETAIL ON LREC AND THE RELATIONSHIP**  
15 **WITH LYNCHES RIVER.**

16 **A:** LREC is a consumer cooperative founded in 1939 to provide electricity to citizens in rural  
17 areas where electric energy was not currently available. Because the members of the  
18 cooperative are also the owners, the cooperative is locally owned and operated. Employees  
19 of the cooperative are also local residents who are familiar with the needs of the  
20 communities they serve. Today, LREC is the area’s leading provider of reliable electric  
21 energy and services. With over 21,000 consumers, LREC is the 13<sup>th</sup> largest electric co-op  
22 in South Carolina. Lynch River is LREC’s fiber internet subsidiary that provides internet  
23 service at an affordable price to its member. LREC has been committed to delivering

1 reliable electric energy and related services at a competitive price for over eighty years.

2 **Q: DOES LYNCHES RIVER CURRENTLY PROVIDE TELECOMMUNICATIONS**  
3 **SERVICE IN SOUTH CAROLINA?**

4 **A:** Yes, Lynch River currently provides high-speed fiber internet and phone service  
5 telecommunications service in Chesterfield, Kershaw, and Lancaster counties.

6 **Q: HOW ARE THE COMPANY'S TELECOMMUNICATION SERVICES**  
7 **DIFFERENT FROM OTHER CARRIERS' OFFERINGS?**

8 **A:** The Company provides high-speed fiber optic internet, bringing a new standard to rural  
9 broadband, which can reach Gigabit (1000 Mbps) speeds. Fiber is better at handling  
10 streaming from multiple devices, cutting down on buffering and stalling, even during peak  
11 connection times. The Company's fiber optic offering is faster than cable and satellite, no  
12 contract is required for service and no cancellation fees.

13 **Q: DOES THE COMPANY MEET THE REQUIREMENTS FOR OBTAINING ETC**  
14 **DESIGNATION?**

15 **A:** Yes. Lynch River meets the requirements for ETC designation contained in federal  
16 regulations as well as those enumerated in S.C. Code Regulation §103-690. In compliance  
17 with Section 214(e)(1)(A) of the Communications Act of 1934 Lynch River will offer  
18 services over its own facilities.

19 **Q: HAS LYNCHES RIVER BEEN DESIGNATED AS AN ETC IN OTHER STATES**  
20 **OR TERRITORIES?**

21 **A:** No, Lynch River has not been designated nor has it applied for ETC designation in any  
22 other states or territories.

23 **Q: IN WHAT SERVICE AREAS IS LYNCHES RIVER SEEKING DESIGNATION AS**

1           **AN ETC?**

2   **A:**     Lynches River requests designation as an ETC for its entire service area in South Carolina  
3           as detailed in Exhibit 3 of the Company's Application.

4   **Q:**     **HOW WILL THE COMPANY'S PRESENCE AS AN ETC IN SOUTH CAROLINA**  
5           **SERVE THE PUBLIC INTEREST?**

6   **A:**     Lynches River is uniquely positioned to deploy broadband services through fiber optic  
7           cable in rural areas of South Carolina. LREC has been servicing rural South Carolina for  
8           over 80 years. We know the communities we serve and understand how important it is for  
9           these rural communities to have access to broadband and voice services.

10 **Q:**     **DOES THIS CONCLUDE YOUR TESTIMONY?**

11 **A:**     Yes. Thank you for this opportunity to provide this testimony in support of the Lynches  
12           River Application for Designation as an Eligible Telecommunications Carrier in South  
13           Carolina.



## CERTIFICATE OF SERVICE

The undersigned employee of Elliott & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: Application of Lynches River Communications, Inc. for  
Designation as an Eligible Telecommunications Carrier in  
the State of South Carolina

DOCKET NO.: 2021-316-C

PARTIES SERVED: **Via Electronic Mail**  
C. Lessie Hammond, Esquire  
Donna L. Rhaney, Esquire  
Office of Regulatory Staff  
1401 Main Street, Suite 900  
Columbia, SC 29201  
[lhammonds@ors.sc.gov](mailto:lhammonds@ors.sc.gov)  
[drhaney@ors.sc.gov](mailto:drhaney@ors.sc.gov)  
  
Carolyn G. Lybarker, Esquire  
Roger P. Hall, Esquire  
SC Department of Consumer Affairs  
P.O. Box 5757  
Columbia, SC 29250  
[clybarker@scconsumer.gov](mailto:clybarker@scconsumer.gov)  
[rhall@scconsumer.gov](mailto:rhall@scconsumer.gov)

PLEADING: DIRECT TESTIMONY OF DUSTIN CATOE

November 22, 2021



Linda B. Kitchens, Paralegal  
Elliott & Elliott, P.A.  
1508 Lady Street  
Columbia, SC 29201  
(803)771-0555  
[linda@elliottlaw.us](mailto:linda@elliottlaw.us)